

**REMARKS**

Claims 14-25 are all the claims pending in the application.

Claims 18, 20 and 25 are objected to as being dependent upon a rejected base claim.

Claims 14-25 have been objected.

Claims 14-17, 19, 21-24 are rejected under 35 U.S.C. 102(b) as being anticipated by Chang, "Data Resource Selection in Distributed Visual Information Systems", I.E.E.E.

Knowledge and Data Engineering, Volume 10, pages: 926-946 November 1998.

The Applicants traverse the rejections and request reconsideration.

***Claim objections***

The Examiner continues to object to the claims as allegedly containing confusing subject matter. Specifically, the Examiner objects to the terms "regularity," "perceptual dissimilarity," etc. However, these terms are defined in the present Specification and the mathematical formulae that represent these terms are discussed in the Specification in detail.

For example, as noted on page 7, regularity is represented using quantitative measurements  $P^{(i)}$  and  $P^{(j)}$  which are integers within a certain range. Larger values indicate stronger regularity of the image. In the previous response, the Applicants submitted a reference by Manjunath et al, titled "A texture descriptor for browsing and similarity retrieval." On page 3, column 2, regularity is clearly defined. It is clearly stated that regularity represents the degree of structuredness of an image.

In short, regularity represents a degree to which various parts of the image are organized into a pattern that is perceived by a viewer. The more structured the image, higher is the

regularity. Further, Fig. 2(a) of this reference shows an image that is more regular compared to the image shown in Fig. 2(b). A skilled artisan would know the meaning of regularity reading the Specification and what is well-known in the art.

Likewise, it is clear from the description on page 7 that perceptual dissimilarity is a function of the difference between the regularities of two images. For example, if an image is highly regular and structured (like a geometrical shape), it will be perceptually very dissimilar to another image that is highly irregular (like an aerial image of a dense forest).

***Prior art rejections based on Chang***

As noted in the previous response, the perceptual dissimilarity is automatically computed in the present invention. On the other hand, in Chang a perceptive weighting factor is adjusted by the user. In the present Office Action, the Examiner appears to have ignored the Applicants' arguments since this feature is not included in the claims. The Applicants respectfully amend the independent claims 14, 20 and 21 to explicitly recite the above-mentioned feature.

Claims 15-17, 19 and 22-24 are allowable at least based on their dependency.

***Allowed Claims***

The Examiner is requested to hold the status of claims 18, 20 and 25 in abeyance pending resolution of the status of the base claims.

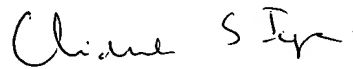
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. §1.116  
U.S. Patent Application No.: 09/822,853

Attorney Docket No.: Q59547

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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